

NO. 0078 P. 2/2  
Page 1 of 1  
JUN 13 2008  
250 MADISON AVENUE  
JUDGE ROBERT P. PATTERSON  
2ND FLOOR  
NEW YORK, N.Y. 10016  
TELEPHONE (212) 545-8777  
FAX (212) 679-1844

RUBINSTEIN & COROZZO, LLP  
COUNSELORS AT LAW

RONALD RUBINSTEIN  
JOSEPH R. COROZZO  
DENNIS GIACOMO VILELLA

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/13/08

June 13, 2008

Via Facsimile (212 - 805 - 7917)

Honorable Robert P. Patterson  
United States District Judge  
500 Pearl St., Room 2550  
New York, NY 10007

MEMO ENDORSED

RE: *United States v. Daniel Karron*, 07-cr-00541

Dear Honorable Judge Patterson:

Pursuant to Federal Criminal Procedure Rule 29 (c) (1), "A defendant may move for a judgment of acquittal, or renew such a motion, within 7 days after a guilty verdict or after the court discharges the jury, whichever is later."

On June 10, 2008, counsel moved this court after the close of all the evidence at trial for a judgment of acquittal on behalf of Daniel Karron because the evidence was insufficient as a matter of law to sustain a conviction. That motion was denied on the record.

One June 11, 2008, the jury returned a guilty verdict against Daniel Karron. Counsel now renews its motion for a judgment of acquittal following the guilty verdict. However, counsel respectfully requests an extension of the 7 day period to renew its motion for a judgment of acquittal to submit a memorandum of law in support of its motion.

Therefore, counsel respectfully requests thirty days from the guilty verdict in this matter or until Monday, July 14, 2008 to submit a memorandum of law in support of its motion for a judgment of acquittal as to Daniel Karron on all counts.

Respectfully submitted,



Ronald Rubinstein

cc: AUSA Steven Kwok via facsimile (212) 637-2390

Application granted in  
part. The court will extend  
defendant's time to file its  
motion to June 25, 2008.  
So ordered  
Robert Patterson  
USA  
6/13/08